## **JacksonLewis**

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November 6, 2023

## **VIA ECF**

Hon. Paul A. Engelmayer, U.S.D.J. United States District Court Southern District of New York 40 Foley Square New York, NY 10007

Re: Awusie v. Hudson Yards Catering, LLC, et al. Case No. 1:22-cv-03162 (PAE)

Dear Judge Engelmayer:

We represent Defendants Hudson Yards Catering, LLC and Alan Zurita in the above-referenced matter. We write with Plaintiff's consent to respectfully request that the current discovery schedule be extended by thirty days so that the discovery schedule is as follows:

Action	Current Deadline	Proposed Deadline
All fact discovery and depositions will be completed		12/14/2023
All expert discovery will be completed	12/14/2023	1/14/2024

Both Parties have been working diligently to complete discovery since our firm was retained to represent Defendants in early September (see ECF No. 38) and we completed production of ESI on October 20, 2023, as planned. Now we are waiting for Plaintiff's medical providers to send us her records so that we can take her deposition and ensure all relevant issues are covered in one sitting. It is unclear as of now whether we will have the records by the current deposition deadline of November 14, as we received authorizations back on or about October 10, 2023, and despite promptly forwarding to providers have not received any responses to date. Accordingly, we respectfully request the additional time to be able to procure and review said records prior to taking Plaintiff's deposition, particularly in light of upcoming holidays.

This is the second request for an extension of this deadline since our firm was retained by Defendants. Our previous request was granted.

We thank the Court for its attention to this matter.

Respectfully submitted,

JACKSON LEWIS P.C.

s/Richard I. Greenberg
Richard I. Greenberg

cc: All Counsel (Via ECF)

Granted. The Court *sua sponte* reschedules the next case management conference in this case to Tuesday, January 16, 2024, at 2 p.m. SO ORDERED.

Dated: November 6, 2023 New York, New York PAUL A. ENGELMAYER United States District Judge

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